

## **EXHIBIT 4**

GOODWIN | PROCTER

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**VIA EMAIL**

William D. Schultz, Esq.  
Merchant & Gould P.C.  
3200 IDS Center  
80 South 8th Street  
Minneapolis, MN 55402-2215

Re: ***ePlus, Inc. v. Lawson Software, Inc.***  
**Civil Action No. 3:09cv620 (REP)**

Dear Will:

ePlus agrees to conduct the Rule 30(b)(6) deposition and inspection on Lawson's legacy software systems on Tuesday, June 8, 2010, at Goodwin Procter's offices in Washington, D.C. We plan to begin the deposition at 10 am. ePlus also proposes a meet-and-confer for Friday, June 4, 2010 to discuss any technical arrangements that need to be addressed before the deposition. Please let us know your availability.

Because the deposition and inspection on the Lawson legacy systems will take place the day before ePlus's rebuttal expert report on validity is due, ePlus intends to timely supplement its rebuttal expert report on validity to address the Lawson Release 5.0 and 6.0 systems after it serves its rebuttal report on June 9, but sufficiently in advance of Mr. Hilliard's deposition so that Lawson has an opportunity to review the supplement to the rebuttal report prior to Mr. Hilliard's deposition.

In order to facilitate an effective deposition and inspection next week, below please find a list of background topics that ePlus intends to inquire about regarding the legacy systems identified in your May 27 letter. This list should in no way be interpreted to be a comprehensive list of topics for the deposition, but rather is intended to provide Lawson the opportunity to collect more detailed information on the legacy systems prior to the demonstrations that will take place on June 8. For each system that Lawson intends to demonstrate on June 8, please be prepared to provide the following background information:

1. the circumstances regarding how, where, and from whom the legacy system was obtained;

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2. the setup and configuration of the legacy system;
3. the software specifications for each Lawson application demonstrated, including release numbers, release dates, and dates of actual implementation for all modules, as well as the details on any post-release modifications;
4. the specifications for any other software running on any machine used as part of the demonstration, including all operating systems, utilities, software emulators, and remote-access software;
5. the specifications for the computer hardware used for the demonstration, including both the hardware running the software, the hardware operated locally by the witness, and any other machine used as part of the demonstration; and
6. the configuration and specifications of all connections made among all machines used as part of the demonstration, including the connection between the machine running the legacy software and the machine operated locally by the witness, and any network used to facilitate the deposition.

Finally, *ePlus* notes that on May 24, 2010, Lawson produced a DVD with Bates number L0417613 that was identified as “software code needed to perform the 6.0 inspection.” Lawson provided no instructions on how to use the files produced, nor has *ePlus* itself been able to determine how to use, or even read, the files. To the extent that Lawson intends to rely upon these files, *ePlus* requests that Lawson provide instructions on their use, including what type of system or software is required to open, read, and execute the files.

Sincerely,

/s/ Michael G. Strapp

Michael G. Strapp

cc: Counsel of Record